

OFFICE OF
GENERAL COUNSEL

IN THE
FEDERAL ELECTION COMMISSION 2020 FEB 11 AM 10: 27
Washington, District of Columbia

In re)
)
)
COLEMAN WORLDWIDE MOVING, LLC,)
JEFF COLEMAN, and)
JEFF COLEMAN FOR CONGRESS, INC.,)
)
Respondents.)

Matter Under Review No. 7695

VERIFIED COMPLAINT

This is a verified complaint against Coleman Worldwide Moving, LLC (“Coleman Worldwide”), its President, Alabama congressional candidate Jeff Coleman (“Mr. Coleman”), and Mr. Coleman’s campaign committee, Jeff Coleman for Congress, Inc. (“Coleman for Congress”), for making and accepting source prohibited and excessive in-kind campaign contributions. Specifically, Coleman Worldwide has permitted the uncompensated use of its semi-trailers by the Coleman Campaign for the purpose of displaying large pictures of Mr. Coleman, his campaign logo and website address throughout Alabama’s Second Congressional District.

Federal law prohibits corporations from making direct or indirect contributions to candidates for federal office. 52 U.S.C. § 30118(a). The uncompensated use of corporate resources by or on behalf of a federal candidate constitutes such a prohibited contribution. 11 C.F.R. § 114.9. The attached picture shows a Coleman Worldwide semi-trailer, wrapped in the logo and branding of Mr. Coleman’s congressional campaign, located on the side of Highway 31 North between Montgomery and Prattville in the Second Congressional District. The mud flaps on the semi-trailer conclusively identify it as belonging to Coleman Worldwide. There are several other such semi-trailers, similarly wrapped and situated, located across the district—and have been since the early Fall. Mr. Coleman in all likelihood directed the use of his company’s semi-trailers in this manner, and Coleman for Congress very clearly has accepted the benefit of this free advertising, as evidenced by the campaign’s disclaimer on the trailer wrap. And yet, the Coleman Campaign’s FEC reports disclose no payments to Coleman Worldwide for the use of its semi-trailers, either by Coleman for Congress or by Mr. Coleman himself. This is an open-and-shut violation of federal campaign finance law, literally caught on camera for everyone to see.

These violations are particularly galling because Coleman Worldwide has been accused, in a complaint filed by the United States Department of Justice, of defrauding the Department of Defense by systematically falsifying shipment weights in order to overcharge the government for the costs of relocating our military men and women and their families in a time of war. Coleman Worldwide settled those charges in exchange for a payment of \$5 million, but presumably kept the

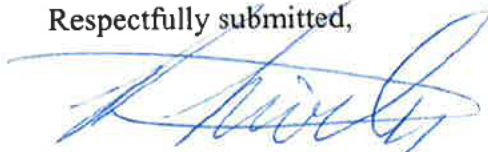
rest of the money it allegedly took from the U.S. Treasury—which, according to the Department of Justice, was as much as \$723 million. If the allegations against Coleman Worldwide are true, this would mean that Coleman Worldwide would be financing Mr. Coleman's congressional campaign with money taken from the very taxpayers he seeks to represent.

For all these reasons, I urge the Commission to open an investigation of this matter and to require Mr. Coleman, his company and his campaign to answer these and other questions under oath:

- Does Coleman Worldwide, or one of its parents, subsidiaries or affiliates, own the semi-trailers at issue?
- How many semi-trailers has Coleman for Congress used in this manner?
- When were the semi-trailers first deployed to their locations throughout the Second Congressional District?
- Did Mr. Coleman order, direct or request the use of his company's semi-trailers in this manner?
- Who delivered the semi-trailers to their locations—employees, contractors or other agents of Coleman Worldwide (or one of its parents, subsidiaries or affiliates)?
- Were the individuals who delivered the semi-trailers to their locations ordered, directed or requested to do so by a supervisor?
- What other involvement did employees, contractors or other agents of Coleman Worldwide (or one of its parents, subsidiaries or affiliates) have in this scheme? Did they apply the trailer wrap themselves, or did they deliver the trailers to a campaign vendor, such as Durden Outdoor Displays, to be wrapped?
- Were the individuals who delivered the semi-trailers to their locations ordered, directed or requested to do so by Mr. Coleman or another company manager or supervisor?

Following such an investigation, I urge the Commission to find that the Respondents conspired to violate, and in fact have violated, federal campaign finance law, determine the fair value of Coleman for Congress's use of Coleman Worldwide's semi-trailers and its employees and other labor, demand that Coleman for Congress disgorge the full value of those illegal in-kind contributions to the U.S. Treasury, determine whether Coleman Worldwide compelled its employees or other agents into the service of Mr. Coleman's congressional campaign and order such additional remedies as the Commission finds warranted, and then make its file in this matter public so that the taxpayers and voters in Alabama's Second Congressional District can examine the record and reach their own conclusions concerning Jeff Coleman's questionable conduct.

Respectfully submitted,



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STATE OF ALABAMA)
CITY/COUNTY OF Autauga)

to wit:

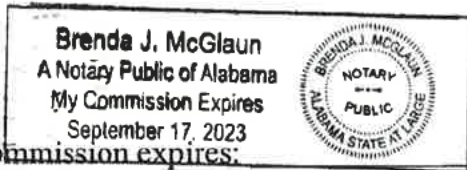
AFFIDAVIT

The allegations of fact and other statements in the foregoing Complaint are true, complete and accurate to the best of my knowledge, information and belief.

RICHARD D. LIVELY

[Handwritten signature of Richard D. Lively]

Subscribed and sworn before me, a Notary Public of and for the State of Alabama, by Richard D. Lively on February 4, 2020.



[Handwritten signature of Brenda J. McGlaun]
Notary Public

My commission expires:

